

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**YELENA RUDERMAN,**

**Plaintiff,**

**- against -**

**LAW OFFICE OF YURIY PRAKHIN, P.C., and  
YURIY PRAKHIN, ESQ., in his individual and  
professional capacities,**

**Defendants.**

**Case No. 19-CV-02987 (RJD)(RLM)**

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** upon the accompanying Memorandum of Law, the Affidavit of Affidavit of Yuriy Prakhin, sworn to on May 10, 2021, and the exhibits attached thereto, Affidavit of Irene Raskin, sworn to on May 10, 2021, and the exhibits attached thereto, Affidavit of Gil Zohar, Esq., sworn to on May 10, 2021, Affidavit of Erica Larsen, sworn to on May 10, 2021, Affidavit of Patricia Belous, sworn to on May 10, 2021, the Declaration of Mary Ellen Donnelly, Esq., and all of the exhibits submitted herewith, Defendants Law Office of Yuriy Prakhin, P.C., and Yuriy Prakhin, Esq., (collectively, “Defendants”) will move this Court before the Honorable Raymond J. Dearie, United States District Judge for the Eastern District of New York, United States District Court, located at 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be designated by the Court for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting summary judgment in favor of Defendants and dismissing the Complaint of Plaintiff Yelena Ruderman in its entirety, and for such further relief as this Court deems just and proper.

Dated: New York, New York  
May 11, 2021

/s/ MED  
Mary Ellen Donnelly  
Nicole E. Price  
**BOND SCHOENECK & KING PLLC**  
600 Third Avenue, 22<sup>nd</sup> Floor  
New York, New York 10016  
(646) 682-0020

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 11th day of May, 2021, I have caused the foregoing Notice of Motion, Memorandum of Law, Affidavit of Yuriy Prakhin, Affidavit of Irene Raskin, Affidavit of Gil Zohar, Affidavit of Erica Larssen, Affidavit of Patricia Belous, and Declaration of Mary Ellen Donnelly, Esq., to be electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

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/s/ MED

Mary Ellen Donnelly